

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

AARON ABADI, Plaintiff, -against- AMERICAN AIRLINES, INC., et al., Defendants.	Civil Action No.: 1:23-cv-04033 LJL
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NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law dated March 11, 2024, the Declaration of Raphael Linares Felipe, and upon all prior pleadings and proceedings in this action, Defendant Azul Linhas Aéreas Brasileiras S.A. (“Azul”), by and through its attorneys, Richard Friedman PLLC, shall move this Court at the United States District Court for the Southern District of New York, United States Courthouse, 500 Pearl Street, New York, NY 10007, before the Honorable Lewis J. Liman, United States District Judge, on a date and time to be set by the Court, for an order dismissing each of Plaintiff’s separate counts against it in the Complaint, including Counts 7 through 31, 33, 34, 36, and 37, and all requests for damages, attorneys’ fees and costs, and for declaratory and injunctive relief, pursuant to Rules 12(b)(1), 12(b)(2), and 12(b)(6) of the Federal Rules of Civil Procedure, and for any other relief deemed appropriate by the Court.

PLEASE TAKE FURTHER NOTICE that Plaintiff will be required to respond pursuant to a briefing schedule to be set by the Court or, in the absence of a specific order, by Local Rule 6.1(b).

Dated: March 11, 2024
New York, New York

Respectfully Submitted,

By: /s/ Richard B. Friedman
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Azul Linhas Aéreas Brasileiras S.A.

CERTIFICATE OF SERVICE

I, Richard B. Friedman, hereby certify that a true and correct copy of the foregoing NOTICE OF MOTION to dismiss on behalf of Defendant Azul Linhas Aéreas Brasileiras S.A. (“Azul”) was served on March 11, 2024 upon all counsel of record including the Plaintiff *pro se* (at the e-mail address below) via the Court’s CM/ECF Filing Portal, through which service is complete upon the transmission and receipt of the notice of docket activity of this (these) document(s):

Mr. Aaron Abadi
Abadi.rne@gmail.com
Plaintiff Pro Se

s/ Richard B. Friedman
Richard B. Friedman
André G. Castaybert